

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
LARRY DONNELL RASCOE	:	
aka Larry Donnell Rascoe, Sr	:	CASE NO. 1:19-bk-04360
MICHELLE CHARLENE RASCOE	:	
	:	
aka Michelle Rascoe	:	
Debtor(s)	:	
	:	
SANTANDER CONSUMER USA	:	
Movant	:	
	:	
LARRY DONNELL RASCOE	:	
aka Larry Donnell Rascoe, Sr	:	
MICHELLE CHARLENE RASCOE	:	
	:	
aka Michelle Rascoe	:	
Respondent(s)	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Proof of value of collateral is demanded at trial and this paragraph is therefore denied.
5. Denied. Debtors intend to cure the arrearages within a reasonable time.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron
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